

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO**

---

MELODY JOY CANTU AND DR. RODRIGO  
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL  
FORENSICS CORPORATION, LLC,

Defendants.

---

**Seventh Continuance Request**

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu, in their seventh continuance request, through their undersigned attorneys, hereby stipulate:

1. The last filed motion in this matter is Defendant Dr. Sandra Guerra's Response to Plaintiffs' Motion to Quash Subpoenas.
2. The parties are currently going through discovery. Plaintiffs and Defendants have sent out and received discovery requests; parties have also conducted depositions.
3. Mediation between all parties is scheduled for August 15, 2022.
4. Following the previous weeks' depositions, parties are still waiting to receive and review transcripts.
5. Depositions revealed that information is being withheld by both Co-Defendants, which is concerning to Plaintiffs.
6. Defendant Digital Forensics Corporation, LLC has yet to produce a single document, and provides blanket boilerplate objections on all but every question asked in Plaintiffs' discovery requests. Therefore, Plaintiffs have concluded that they will need to file additional motions to compel in order to receive withheld discovery.
7. Depositions also revealed discrepancies between Co-Defendants' accounts of produced discovery, and we require time for review.
8. Plaintiffs' counsel reached out to opposing counsel for both Co-Defendants and conferred, in good faith, regarding Plaintiffs' request for a 30-day continuance.
9. Both Co-Defendants oppose continuing the current discovery deadline of July 31, 2022, per the scheduling order (Dkt. No. 89).
10. Plaintiffs request the following new deadlines:

- August 31, 2022: Discovery Deadline
- September 30, 2022: Last Day to File Dispositive Motions

Dated: July 29, 2022

Respectfully submitted,

/s/ Tor Ekeland

Tor Ekeland (NY Bar No. 4493631)  
*Pro Hac Vice*  
Tor Ekeland Law, PLLC  
30 Wall Street, 8th Floor  
New York, NY  
t: (718) 737 - 7264  
f: (718) 504 - 5417  
tor@torekeland.com

and

/s/ Rain Levy Minns

Rain Minns  
State Bar No. 24034581  
Minns Law Firm, P.C.  
d/b/a Rain Minns Law Firm  
4412 Spicewood Springs Rd., Suite 500  
Austin, Texas 78759-8583  
Tel.: 512-372-3222  
Fax: 512-861-2403  
rain@rainminnslaw.com

*Counsel for Plaintiffs Melody Joy Cantu and  
Dr. Rodrigo Cantu*

**Certificate of Service**

I certify that on this 29<sup>th</sup> of July 2022, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Tor Ekeland